

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

JOEL M. YOUNG,
an individual,

Plaintiff,

v.

Case No. 1:21-cv-00917

TESLA, INC.,
a Delaware Corporation,

Defendant.

**STIPULATED REQUEST FOR EXTENSION OF TIME FOR
DEFENDANT TESLA, INC. TO FILE RESPONSIVE PLEADINGS OR 12(b) MOTIONS**

Defendant Tesla, Inc. (“Tesla”), through its attorneys, respectfully asks the Court to enter an order extending the time for Tesla to file its responsive pleadings or Fed. R. Civ. P. 12(b) motions by fourteen (14) days to October 11, 2021. Plaintiff Joel M. Young (“Plaintiff”) consents to Tesla’s extension request. In support of this request, Tesla states as follows:

On August 18, 2021, Plaintiff filed a Complaint captioned *Joel M. Young v. Tesla, Inc.* in the Thirteenth Judicial District Court, Sandoval County, State of New Mexico, under Civil No. D-1329-CV-2021-01255. On September 20, 2021, Tesla filed a notice of removal of action under 28 U.S.C. § 1441 in this Court. *See* Dkt. 1. Under Federal Rule of Civil Procedure 81(c)(2)(C), Tesla must file its answer or defenses and objections within seven days of the notice of removal, or by September 27, 2021.

Tesla is retaining outside litigation counsel to appear and defend the company in this matter. To facilitate Tesla’s retention of litigation counsel, Tesla requests a two-week extension of Tesla’s deadline to file a responsive pleading or motion to dismiss the complaint. Tesla asked Plaintiff if he would consent to a two-week extension and Plaintiff agreed.

Based on the above, Tesla respectfully requests that this Court enter an order extending the deadline for responsive pleadings or Fed. R. Civ. P. 12(b) motions by fourteen (14) days, to October 11, 2021.

September 24, 2021

Respectfully submitted,



TYLER M. CUFF

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.
201 Third St. NW, Suite 2200
Albuquerque, NM 87102
(505) 768-7267
tcuff@rodey.com

Counsel for Defendant Tesla, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2021, I filed the foregoing document electronically through the CM/ECF system, which caused all parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

Joel M. Young
P.O. Box 424
Placitas, NM 87043
(505) 243-5696
jmyoung@swcp.com

Plaintiff Pro Se

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

By: _____



Tyler M. Cuff